

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Plaintiffs and Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
CARLOS MUNOZ, INDIVIDUALLY AND)	No.: 07-CV-10531 (AKH)
ON BEHALF OF ALL OTHERS)	
SIMILARLY SITUATED,)	
)	
Plaintiff,)	LEAD PLAINTIFFS'
)	NOTICE OF MOTION FOR
vs.)	ORDER DECLARING THE
)	PSLRA DISCOVERY STAY
)	IS NO LONGER IN EFFECT
CHINA EXPERT TECHNOLOGY, INC.,)	
)	
Defendant.)	
_____)	

PLEASE TAKE NOTICE that Lead Plaintiffs CXTI Investors (the "Plaintiffs") hereby move this Court, the Honorable Alvin K. Hellerstein, United States District Judge, for an order:

- (a) declaring that the stay of discovery, as set forth in Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA") 15 U.S.C.A. § 78u-4(b)(3)(B), is no longer in effect; and
- (b) allowing Plaintiffs to engage in any discovery as permitted under the Federal Rules of Civil Procedure, including but not limited to document requests, interrogatories, and depositions.

In support of this Motion, Plaintiffs submit: (1) the Declaration of Phillip Kim dated March 31, 2008; (2) Memorandum of Law dated March 31, 2008; and (3) a [Proposed] Order declaring the PSLRA discovery stay to be no longer in effect annexed hereto.

Dated: March 31, 2008

Respectfully submitted,

By: /s/ Phillip Kim
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Lead Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2008, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Notice was provided via First Class Mail to:

China Expert Technology, Inc.,
C/O Registered Agent
Incorp Services, Inc.
3155 East Patrick Lane, Suite 1
Las Vegas, NV 89120-3481

/s/ Phillip Kim

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Lead Counsel for Plaintiffs and Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLOS MUNOZ, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

CHINA EXPERT TECHNOLOGY, INC.,

Defendant.

No.: 07-CV-10531 (AKH)

**[PROPOSED] ORDER
DECLARING THE PSLRA
STAY OF DISCOVERY IS
NO LONGER IN EFFECT**

[PROPOSED] ORDER

Lead Plaintiffs CXTI Investors (the “Plaintiffs”) by and through Lead Counsel the Rosen Law Firm, P.A. having filed a motion pertaining to Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”) 15 U.S.C.A. § 78u-4(b)(3)(B) for an order declaring that the PSLRA discovery stay is no longer in effect; and

The Court having considered the Plaintiffs' motion, the Memorandum of Law, the Declaration of counsel, all submitted in support thereof; and

The Court having found that Plaintiffs have sufficiently demonstrated that their motion does

not contravene the legislative intent of the PSLRA discovery stay;

IT IS HEREBY ORDERED THAT:

1. The stay of discovery is no longer in effect; and
2. Plaintiffs may engage in any discovery as permitted under the Federal Rules of Civil Procedure, including but not limited to document requests, interrogatories, and depositions.

SO ORDERED:

Dated _____, 2008

HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE